

Message

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**From:** LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]  
**Sent:** 10/2/2017 9:29:49 PM  
**To:** Brooks, George P CIV [george.brooks@navy.mil]  
**Subject:** FW: Several more items FW: Followup on my voicemail yesterday: List of items from call 9/20/17 and other previous calls  
**Attachments:** RadRiskQAwithtransmitmemo\_June\_13\_2014.pdf

Dear Pat,

Now that you have sent out the report, I wanted to revisit some of these items. Thanks!

- Lily

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**From:** LEE, LILY  
**Sent:** Tuesday, September 26, 2017 1:38 PM  
**To:** 'Brooks, George P CIV' <george.brooks@navy.mil>  
**Subject:** Several more items FW: Followup on my voicemail yesterday: List of items from call 9/20/17 and other previous calls

Dear Pat,

I hope you are well. I just left you another voicemail. I wanted to check in with you about several things:

- Buildings rework & search for duplications
- Review time for upcoming reports (My health physicists are both getting deployed to Puerto Rico)
- Language suggestion on upcoming reports – I saw your maps use “Recommended for no further action,” but since last Tues by phone you anticipated some of these would actually be sampled later, I wanted to suggest using language that is more accurate and open, .e.g. “Falsification not found in Phase 1.”

Thanks!

- Lily

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**From:** LEE, LILY  
**Sent:** Friday, September 22, 2017 3:12 PM  
**To:** 'Brooks, George P CIV' <george.brooks@navy.mil>  
**Cc:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Subject:** Followup on my voicemail yesterday: List of items from call 9/20/17 and other previous calls

Dear Pat,

Thank you for talking on Wednesday, 9/20 about various topics. I left you a voicemail yesterday, but I just remembered your voicemail sometimes doesn't work, so I am sending you this email about a few things I forgot to bring up on Wednesday.

In past calls, we had talked about these items, and I had forgotten to check in with you about them on Wednesday:

1. We talked a few weeks ago about the Navy possibly changing the Parcel B map to show only areas where specifically potential evidence of falsification had been observed. I understand that your 3<sup>rd</sup> party expert consultants also found data quality problems that may or may not be signs of falsification. You had agreed that

for the maps in the upcoming reports that you would show in a different color survey units where data quality concerns have been found. Please add these to the next version of these maps.

2. Regarding data quality, as I said at the 9/12 meeting, I know that data quality was not the task assigned to your contract team. However, to the extent that the Navy will propose consideration of use of Tetra Tech previously collected data for any future decisions, I am interested to learn more about the data quality issues that your consultants found. I appreciated that Craig gave an informal listing off the top of his head of data quality observations for buildings. I'd like to hear a more complete list of data quality observations for both buildings and soil from the 3<sup>rd</sup> party independent consultants. Maybe the Oct. 3 regular call would be a good time to hear these. Or you could email out a list.
3. We talked several weeks ago about the request from Greenaction for records from the technical meetings, including agendas, participants lists, and minutes.

As I promised, I sent you the attached EPA HQ Q&A about rad. I forgot that I also promised to send you some relevant excerpts, which are below.

To make sure I don't forget again, I want to write out some other items from the 9/20 call. I appreciate hearing that you committed to follow up on these:

1. History of Navy knowledge and communication about missing biased static measurements in buildings
2. Staff in Battelle doing oversight of rad who may have previously worked for Tetra Tech EC, Inc.
3. Request at the CAC public meeting to interview all former workers

Excerpts from the attached 2014 EPA Q&A's document

- OSWER Directive 9200.4-40, EPA 540-R-012-13, May 2014, Q3, p. 8: "EPA's Superfund remedial program general practice has been to use the NTE approach for soil where residential land use is assumed."
- Id., Q35, p. 28: "this ARAR evaluation tool should not be used as a to be considered (TBC) as a basis for establishing 12 mrem/yr cleanup levels at CERCLA remedial sites."
- Id., Q33, p. 27, and OSWER Directive 9200.4-18 (U.S. EPA 1997a): "cleanup levels not based on an ARAR should be based on the carcinogenic risk range (generally  $10^{-4}$  to  $10^{-6}$ , with  $10^{-6}$  as the point of departure and  $1 \times 10^{-6}$  used for PRGs."
- Id., Q34, p. 27: "Consistent with existing Agency guidance for the CERCLA remedial program, while the upper end of the risk range is not a discrete line at  $1 \times 10^{-4}$ , EPA generally uses  $1 \times 10^{-4}$  in making risk management decisions. A specific risk estimate around  $10^{-4}$  may be considered acceptable based on site-specific circumstances."

Lily Lee

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For information on Superfund in general: [www.epa.gov/region9/superfund](http://www.epa.gov/region9/superfund)

For information on Hunters Point Naval Shipyard: [www.epa.gov/superfund/hunterspoint](http://www.epa.gov/superfund/hunterspoint)